Section I: FY 2000/2001 RECAP OECA Performance Measures: MOA PRIORITY MEASURES by Sector and Media Priority

The MOA measures are included in this section of RECAP rather than under enforcement outcome or outputs because they are primarily new measures and will need special emphasis.

Measur e Code	Measure	Data Source	Reporting Directions		
Wet Wea	Wet Weather ¹ (time period for all Wet Weather inspection measures is based on the water inspection year: July 1 - June 30 th time period of all Wet Weather enforcement action measures is based on the fiscal year: October 1 - September 30 th)				
CSOs: Pr	ogram Leads: John Dombrowski, Office of Compliance; Kat	hy Greenwald, Office of Regulatory Enforce	eement		
MOAW W1	Pollutant load to be reduced as a result of commitments in enforcement actions for CSOs. (common unit to be determined)	Docket (Annual) Case Conclusion Screen: POAM. POLL, POID, POUT Violation Information Screen/Violation Type: CSO	A new violation type has been created on the case initiation screen of docket to track these pollutant reductions. Data needs to be entered in the CCDS and the case initiation screen.		
MOAW W2	Compliance status of CSO systems with CSO Control Policy	Manual (Annual)	Report using attached reporting form.		
MOAW W3	Number Compliance Evaluation Inspections that had CSO components	PCS (Semi-annual) Select inspection code Y (CSO) for all permit types.	Compliance Evaluation Inspections that had CSO components should now be recorded in PCS using inspection code Y.		
MOAW W4	Percent of Compliance Evaluation Inspections that had CSO components in Priority Watersheds	Manual & PCS (Semi-annual)	Regions must manually report the HUC codes on the attached reporting form for their Regionally defined Priority Watersheds so we can pull this measure from PCS.		
MOAW W5	Number of CSO enforcement actions initiated and concluded	Docket (Annual) Violation Information Screen/Violation Type: CSO	Initiated CSO enforcement actions should be recorded in DOCK ET on the case initiation screen. Concluded cases should be recorded in DOCKET using the CCDS.		

¹The majority of the measures are EPA only, however, the CAFO team is asking regions to collect state inspection data and report it to Hqs manually.

Measur e Code	Measure	Data Source	Reporting Directions
MOAW W6	Number of CSO systems reached through compliance assistance	RCATS (Semi-annual)	

SSOs Program Leads: John Dombrowski, Office of Compliance; Kathy Greenwald, Office of Regulatory Enforce

MOAW W7	Number of Compliance Evaluation Inspections that had SSO components	PCS (Semi-annual) Select on inspection code V (SSO) for all permit types.	Compliance Evaluation Inspections that had SSO components should now be recorded in PCS using inspection code V.
MOAW W8	Number of inspections targeted to identify SSOs	Manual (Semi-annual)	Report using attached reporting form.
MOAW W9	a. Percent of Compliance Evaluation Inspections that had SSO components in Priority Watershedsb. % targeted inspections for SSOs in priority watersheds	a. Manual & PCS (Semi-annual) b. Manual (Semi-annual)	a. Regions must manually report the HUC codes for their Regionally defined Priority Watersheds so we can pull this measure from PCS.b. Report using attached reporting form.
MOAW W10	Number of SSO enforcement actions initiated and concluded.	Docket (Annual) Violation Information Screen/Violation Type: SSO	Initiated SSO enforcement actions should be recorded in DOCKET on the case initiation screen. Concluded cases should be recorded in DOCKET using the CCDS.
MOAW W11	Percent of enforcement actions initiated and concluded in priority watersheds for SSOs	Manual (Annual)	Report using attached reporting form.
MOAW W12	Number of SSO systems reached through compliance assistance.	RCATS (Semi-annual)	

Stormwater Program Leads: Peter Bahor, Office of Compliance; Brad Mahanes, Office of Regulatory Enforcement

Measur e Code	Measure	Data Source	Reporting Directions		
MOAW W13	Number of facilities with: 1) Individual or 2) General Stormwater permits.	PCS (Annual). 1) Individual Stormwater permits will be selected using PTYP = S, and PTYP = 'blank' and outfall type (OUTT) = R (Stormwater). 2) General Stormwater permits will be selected using PTYP = R.	This data is required to be reported in PCS for both EPA and states.		
MOAW W14	Number of Compliance Evaluation Inspections that had Stormwater components	PCS (Semi-annual) Select inspection code W at all permit types.	Compliance Evaluation Inspections that had Stormwater components should now be recorded in PCS using inspection code W.		
MOAW W15	Percent of Compliance Evaluation Inspections with Stormwater components in Priority Watersheds	Manual & PCS (Semi-annual)	Regions must manually report the HUC codes for their Regionally defined Priority Watersheds so we can pull this measure from PCS.		
MOA WW16	Number of initiated and concluded Stormwater enforcement actions.	Docket (Annual) Violation Information Screen/Violation Type: STORM	Initiated Stormwater enforcement actions should be recorded in DOCK ET on the case initiation screen. Concluded cases should be recorded in DOCK ET using the CCDS.		
MOAW W17	Percent of Stormwater enforcement actions initiated and concluded in priority watersheds.	Manual (Annual)	Report using attached reporting form.		
MOAW W18	Number of Stormwater sources reached through compliance assistance.	RCATS (Semi-an nual)			
CAFOs	Os Program Leads: Al Havinga, Office of Compliance; Nadine Steinberg, Office of Regulatory Enforcement				
MOAW W19	Number of facilities that commit to undertake injunctive relief/compliance activities (for each CCDS category) as a result of enforcement actions against CAFOs	Docket (Annual) Violation Information Screen/Violation Type: AFLOT	CCDS should be used for all CAFO cases with data recorded in DOCKET. That is a CAFO action will need to be recorded in case initiation screen.		

Measur e Code	Measure	Data Source	Reporting Directions
MOAW W20	a. Total number of CAFOs by state (permitted and unpermitted facilities).	a. Manual (Semi-annual).	a. & b. Report using attached reporting form.
	b. Total number of CAFOs within priority watersheds by State c. Number and percent of CAFOs with NPDES individual or general permits by State.	b. Manual (Semi-annual). c. PCS (Semi-annual) Individual CAFO permits will be selected using PTYP = 'blank' and PTYP = A (CAFO) and selecting SIC codes = 0211, 0212, 0213, 0214, 0219, 0241, 0252, 0253, 0254, 0259. General CAFO permits will be selected using PTYP = G and selecting GPCT codes = 01, 44, 80, and 81.	c. CAFO individual and general permittee data must be entered into PCS. The new definition of "major" may facilitate this.
MOAW W21	Number of CAFO: a. EPA inspections b. State inspections	a. PCS (Semi-annual) Select on inspection code K (CAFO) for all permit types. b. Manual (Semi-annual).	All EPA CAFO inspections should be recorded in PCS using code K.
MOAW W22	Percent of CAFO inspections in Priority Watersheds a. EPA b. State	a. Manual & PCS (Semi-annual) b. Manual (Semi-annual)	a. Regions must manually report the HUC codes for their Regionally defined Priority Watersheds so we can pull this measure from PCS.b. Report using attached reporting form.
MOA WW23	Number of initiated and concluded CAFO enforcement actions.	Docket (Annual) Violation Information Screen/Violation Type: AFLOT	Initiated CAFO enforcement actions should be recorded in DOCK ET on the case initiation screen. Concluded cases should be recorded in DOCK ET using the CCDS.
MOA WW24	Percent of CAFO enforcement actions initiated and concluded in priority watersheds.	Manual (Annual)	Report using attached reporting form.

Measur e Code	Measure	Data Source	Reporting Directions
MOAW W25	Date when State Compliance and Enforcement Strategies completed for CAFOs	Manual (Semi-annual)	Report using attached reporting form.
MOAW W26	No. of CAFO entities reached through compliance assistance	RCATS (Semi-annual)	
Petroleu	m Refining Program Leads: Tom Ripp and Jim Jackson		
MOAP R1	Pollutant load to be reduced as a result of commitments in enforcement actions for (1) CAA violations for Refinery Fuel Gas; for LDAR; for Benzene Waste-NESHAP; and for NSR/PSD and (2) enforcement actions for RCRA violations at refineries.	Docket (Annual) Case Conclusion Screen: POAM, POLL, POID, POUT Violation Information Screen/Violation Type: REFFG, LDAR, BENZW	A new violation type has been created on the case initiation screen of docket to track these pollutant reductions. Data needs to be entered in the CCDS and the case initiation screen.
MOAP R2	Number of facilities that commit to undertake each of the following CCDS compliance actions/injunctive relief as a result of enforcement: Permit applications received for NSR/PSD; Emissions reductions/controls installed for NSR/PSD, LDAR, Refinery Fuel Gas, Benzene Waste; EMS auditing for refineries. Industrial process changes. Storage/disposal changes.	Docket (Annual) Violation Information Screen/Violation Type: NSR, PSD, REFFG, LDAR, BENZW. Case Conclusion Screen: Compliance Action: EMS	A new violation type has been created on the case initiation screen of docket to track these complying actions. Data needs to be entered in the CCDS and the case initiation screen.
MOAP R3	Pollutant load to be reduced as a result of commitments in self disclosures ² cases for (1) CAA violations at refineries for Refinery Fuel Gas; for LDAR violations; for Benzene waste-NESHAP and NSR/PSD and (2) RCRA violations at refineries.	Docket (Annual) Case Information: ADPA Case Conclusion Screen: POAM, POLL, POID, POUT Violation Information Screen/Violation Type: REFFG, LDAR, BENZW	A new violation type has been created on the case initiation screen of docket to track these pollutant reductions. Data needs to be entered in the CCDS and the case initiation screen.

² In accordance with 3/29/99 memo from Eric Schaeffer, CCDSs should be completed for Audit Policy Cases and Other disclosures.

Measur e Code	Measure	Data Source	Reporting Directions
MOAP R4	Number of investigations at refineries for suspected NSR/PSD violations; LDAR violations; Benzene Waste-NESHAPS and RCRA violations; Refinery Fuel Gas	Manual (Semi-Annual)	Report as part of the mid-year and EOY reporting cycle on the overall NPMS Investigations Manual Reporting Form.
	Existing Measures (No new reporting or data modification and SNC recidivism; # of inspections conducted; # of enfor		
Iron and	Steel Program Leads: Mike Calhoun and Maria Malave		
MOAIS	Pollutant load to be reduced as a result of commitments in enforcement actions taken at facilities with unregulated sources.	Docket (Annual) Facilities Screen: SIC Code 3312, 3315,3316,3317 Case Conclusion Screen: POAM, POLL, POID, POUT Violation Type: UNREG	A new violation type has been created on the case initiation screen of docket to track these pollutant reductions. Data needs to be entered in the CCDS and the case initiation screen.
MOAIS 2	Number of facilities committing to implement (1) groundwater characterization and/or remediation or (2) sediment characterization and/or remediation activities as a result of enforcement actions.	Docket (Annual) Facilities Screen: SIC Code 3312, 3315,3316,3317 Case Conclusion Screen: Compliance Actions: Remediation and Other	Report in Docket using the Case Conclusion Data Sheet.
MOAIS 3	Number of environmental restoration SEPs for (1) groundwater contamination from slag disposal and (2) sediment characterization or remediation.	Docket (Annual) Facilities Screen: SIC Code 3312, 3315,3316,3317 Case Conclusion Screen: Supplemental Environmental Project: ERP plus write in (1) groundwater contamination from slag disposal or (2) sediment characterization or remediation. in SEP description	Report in Docket using the Case Conclusion Data Sheet.
MOAIS 4	Number of facilities self-disclosing violations	Docket (Annual) Facilities Screen: SIC Code 3312, 3315,3316,3317 Case Information: ADPA Screen/Disclosure Policy Information	Report in Docket using the Case Information Screen.

Measur e Code	Measure	Data Source	Reporting Directions
MOAIS 5	Number of facilities which implement changes in waste handling practices as a result of enforcement actions for RCRA KO61 noncompliance.	Docket (Annual) Facilities Screen: SIC Code 3312, 3315,3316,3317 Violation Information Screen/Violation Type: RKOGI Case Conclusion Screen: Compliance Actions: EDC and SDC	Report in Docket using the Case Information Screen and the Case Conclusion Data Sheet.
MOAIS 6	Number of minimills brought into compliance with NSPS AA and AA a baseline testing requirements.	Manua l(Annual)	Report at EOY using manual reporting form.
MOAIS 7	Implementation steps under minimill initiative: number sent letter, number of audits conducted, number of cases concluded.	Manual(Annual: Hqs only)	Report at EOY using manual reporting form.
MOAIS 8	Number of investigations conducted	Manua l(Semi-Annual)	Report as part of the mid-year and EOY reporting cycle on the overall NPMS Investigations Manual Reporting Form.
	Existing Measures (No new reporting or data modification facilities; SNC rate for the sector; SNC duration and SNC r initiated and concluded; No. of facilities reached through c	ecidivism; # of enforcement actions	
Primary	Non-Ferrous Metals Program Leads: Debbie Thomas	and Jenny Garelick	
MOAP NM1	Pollutant load to be reduced as a result of commitments in enforcement actions at Primary Smelters	Docket (Annual) Facilities Screen: SIC Code: 3331, 3334, 3339 Case Conclusion Screen: POAM, POLL, POID, POUT	A new violation type has been created on the case initiation screen of docket to track these pollutant reductions. Data needs to be entered in the CCDS and the case initiation screen.

Measur e Code	Measure	Data Source	Reporting Directions
MOAP NM2	Number of facilities that commit to undertake each of the following CCDS injunctive relief/compliance activities as a result of enforcement actions citing imminent and substantial endangerment: emissions, monitoring/sampling, record keeping	Docket (Annual) Facilities Screen: SIC Code: 3331, 3334, 3339 Case Conclusion Screen: Authorizing Section for Administrative action; Statute/Section Violated for Civil cases. List appropriate authority.	Report in Docket using the facilities screen and the case conclusion screen.
MOAP NM3	Number of facilities committing to implement industrial process changes as the result of Bevill enforcement actions.	Docket (Annual) Facilities Screen: SIC Code: 3331, 3334, 3339 Violation Information Screen/Violation Type: BEVIL Case Conclusion Screen: Compliance Action: IPC	A new violation type has been created on the case initiation screen of docket to track these pollutant reductions. Data needs to be entered in the CCDS and the case initiation screen.
MOAP NM4	Number of facilities reclassified as primary smelters.	Manua l(Annual)	Report using the EOY manual reporting form (attached)
MOAP NM5	Percent of reclassified facilities in compliance with regulatory requirements applicable to primary smelters.	IDEA (Annual)	
MOAP NM6	Number/percent of RCRA permits reviewed for enforceability; Number of RCRA permits revised or identified for revision upon renewal.	Manual (Annual)	Report using the EOY manual reporting form (attached).
MOAP NM7	Number of facilities self-disclosing violations	Docket (Annual) Case Information Screen/Disclosure Policy Information	Report in Docket on the Case Information Screen.
MOAP NM8	Number of investigations conducted	Manual (Semi-Annual)	Report as part of the mid-year and EOY reporting cycle on the overall NPMS Investigations Manual Reporting Form.

Measur e Code	Measure	Data Source	Reporting Directions
	Existing Measures (No new reporting or data modification): Total number of inspections; # of enforcement actions taken citing imminent and substantial endangerment; total # of enforcement actions; No. of facilities reached through compliance assistance; SNC rate for the sector; SNC duration and SNC recidivism.		
Chemica	Sector Program Leads: Joanne Berman and Mary Andrew	S	
MOAC S1	Pollutant load to be reduced as a result of commitments in enforcement actions for SIC codes 2869 and 2899 by CWA, CAA, and RCRA	Docket (Annual) Facility Information Screen: SIC 2869, 2899 Case Conclusion Screen: POAM, POLL, POID, POUT	A new violation type has been created on the case initiation screen of docket to track these pollutant reductions. Data needs to be entered in the CCDS and the case initiation screen.
MOAC S2	Number of facilities that commit to undertake each of the CCDS injunctive relief/compliance activities as a result of enforcement	Docket (Annual) Facility Information Screen: SIC 2869, 2899 Case Conclusion Screen: Compliance Actions all.	A new violation type has been created on the case initiation screen of docket to track these pollutant reductions. Data needs to be entered in the CCDS and the case initiation screen.
MOAC S3	Number of facilities that comply with EPCRA 312 reporting requirements	Manual (Annual)	Report using the EOY manual reporting form (attached).
MOAC S4	Number of facilities self-disclosing violations	Docket (Annual) Case Information Screen/Disclosure Policy Information: ADPA	Report in Docket using the case information/disclosure screen.
MOAC S5	Number of inspections conducted for priority statutory requirements defined by sector strategy;	Manual (Annual)	Report manually using the EOY manual reporting form (attached).
MOAC S6	Number of facilities that comply with regulatory requirements as a result of compliance assistance.	RCATS (Annual)	
	Existing Measures (No new reporting or data modification) facilities reached through compliance assistance; # of enfor SNC rate for the sector; SNC duration and SNC recidivism	cement actions initiated and concluded;	

SDWA Microbial Program Leads: Betsy Devlin and Ken Harmon

Measur e Code	Measure	Data Source	Reporting Directions
MOAS DM1	Number of systems that commit to undertake the following CCDS injunctive relief/compliance activities as a result of enforcement for violation of TCR and SWTR requirements: testing, monitoring/sampling, record keeping, and reporting	Docket (Annual) Violation Information Screen/Violation Type: PWTCR, SWTR	A new violation type has been created on the case initiation screen of docket to track these pollutant reductions. Data needs to be entered in the CCDS and the case initiation screen.
MOAS DM2	Compliance status of 1) SWTR systems; and 2) SWTR systems with groundwater under influence of surface water	SDWIS (Annual) 1) SW; SWP 2) GU; GUP For both SNC Termination Status Codes: SE, SI, SU, SV, SW, SD, SX	Status should be reported in SDWIS.
MOAS DM3	Number and % of systems receiving compliance assistance for interim enhanced SWTR	RCATS (Annual)	
MOAS DM4	Percent TCR and SWTR SNCs addressed (SDWA: Microbial rules)	SDW IS (Annual) Field: Rule Field: Formal Appropriate Action (EFK, EFQ, EF9, EOX, EFV, EF&, EFL, EF/, SFL, SFO, SFK, SFQ, SF9, SOX, SFV, SF&)	Report addressing actions in SDWIS.
	Existing Measures (No new reporting or data modification): # of sanitary surveys conducted; # of enforcement actions initiated and concluded; SNC rate for the systems subject to Microbial Rules; SNC duration and SNC recidivism ³ ; No. of systems reached through compliance assistance ⁴		

Metal Services Program Leads: Bob Tolpa and Kurt Lamber

³Once SDWIS is interfaced to IDEA, we will be able generate this measure.

⁴During FY 2000, Headquarters will explore with the regions options for developing an environmental measure for drinking water.

Measur e Code	Measure	Data Source	Reporting Directions
MOAM S1	Pollutant load to be reduced as a result of enforcement	Docket (Annual) Facility Information Screen: SIC 3471, 3479 Case Conclusion Screen: POAM. POLL, POID, POUT	A new violation type has been created on the case initiation screen of docket to track these pollutant reductions. Data needs to be entered in the CCDS and the case initiation screen.
MOAM S2	Number of facilities that commit to undertake each of the following CCDS injunctive relief/compliance activities as a result of enforcement for RCRA violations: industrial process changes, emission/discharge changes	Docket (Annual) Facility Information Screen: SIC 3471, 3479 Case Information Screen: Law/Section: RCRA Case Conclusion Screen: Compliance Action: IPC, EDC	A new violation type has been created on the case initiation screen of docket to track these complying actions. Data needs to be entered in the CCDS and the case information screen.
MOAM S3	Number of facilities that commit to modify or cease operations to legally avoid permit or other RCRA requirements as a result of enforcement actions	Docket (Annual) Facility Information Screen: SIC 3471, 3479 Case Information Screen: Law/Section: RCRA Case Conclusion Screen: Compliance Action: Other, write-in modify or cease operations to legally avoid permit or other RCRA requirements.	Facilities will be found based on SIC code data being reported on CCDS. Data needs to be entered in the CCDS and the case information screen.
MOAM S4	Number of facilities newly identified as subject to RCRA requirements affecting metal services (not previously in the RCRA system.)	RCRIS (Annual)	
MOAM S5	Number of facilities identified through inspections as having illegal or improper waste management operations.	Manual (Annual)	Report using the EOY manual reporting form (attached).
MOAM S6	Number of investigations conducted	Manual (Semi-Annual)	Report as part of the mid-year and EOY reporting cycle on the overall NPMS Investigations Manual Reporting Form.

Measur e Code	Measure	Data Source	Reporting Directions				
	Existing Measures (No new reporting or data modification) and SNC recidivism; # of inspections conducted; # of enfor						
RCRA P	CRA Permit Evaders Program Lead: Desi Crouther						
MOSP E1	Pollutant load to be reduced as a result of enforcement	Docket (Annual) Case Conclusion Screen: POAM Violation Information Screen/Violation Type: RCRPE	A new violation type has been created on the case initiation screen of docket to track these pollutant reductions. Data needs to be entered in the CCDS and the case initiation screen.				
MOSP E2	Number of facilities that commit to undertake each of the following CCDS injunctive relief/compliance activities as a result of enforcement for RCRA violations: industrial process changes, emission/discharge changes, permit applications, permit modification requests.	Docket (Annual) Violation Information Screen/Violation Type: RCRPE Case Conclusion Screen: all types of actions	A new violation type has been created on the case initiation screen of docket to track these complying actions. Data needs to be entered in the CCDS and the case information screen.				
MOSP E3	Number of facilities that commit to modify or cease operations to legally avoid permit or other RCRA requirements as a result of enforcement actions.	Docket (Annual) Violation Information Screen/Violation Type: RCRPE Case Conclusion Screen: Compliance Action: Other, write-in modify or cease operations to legally avoid permit or other RCRA requirements.	A new violation type has been created on the case initiation screen of docket to track these complying actions. Data needs to be entered in the CCDS and the violation information screen.				
MOSP E4	Number of facilities identified as having misidentified wastes through inspections, which result in enforcement actions.	Docket (Annual) Violation Information Screen/Violation Type: RMISWT	A new violation type has been created on the case initiation screen of docket to track these complying actions. Data needs to be entered in the CCDS and the violation information screen.				
MOAS PE5	Number of investigations conducted	Manual (Semi-Annual)	Report as part of the mid-year and EOY reporting cycle on the overall NPMS Investigations Manual Reporting Form.				

Measur e Code	Measure	Data Source	Reporting Directions			
	Existing Measures (No new reporting or data modification): Total no. of inspections; No. of facilities identified in enforcement actions as having misidentified wastes; Number of enforcement actions initiated and concluded Number of facilities reached through compliance assistance.					
CAA - A	CAA - AIR TOXICS and NSR/PSD Program Leads: Scott Throwe and Mario Jorquera					
MOAC A1	Air toxics pollutant load to be reduced as a result of commitments in enforcement actions against violations of MACT standards	Docket (Annual) Case Information Screen Law/Section: Air Toxics/MACT Standards Case Conclusion Screen: POAM, POLL, POID, POUT	A new violation type has been created on the case initiation screen of docket to track these pollutant reductions. Data needs to be entered in the CCDS and the case initiation screen.			
MOAC A2	Total pollutant load to be reduced for criteria pollutants (NOx, SO2, and PM) for NSR/PSD commitments in enforcement actions	Docket (Annual) Case Conclusion Screen: POAM, POLL, POID, POUT (NOx, SO2, PM) Violation Information Screen/Violation Type: NSR, PSD	A new violation type has been created on the case initiation screen of docket to track these pollutant reductions. Data needs to be entered in the CCDS and the case initiation screen.			
MOAC A3	Number of coal-fired power plants that commit to undertake each of the following CCDS injunctive relief/compliance activities as a result of enforcement: permit applications, emission/discharge changes	Docket (Annual) Facility Information Screen: SIC 4911; Case Conclusion Screen: EDC, PER	A new violation type has been created on the case initiation screen of docket to track these complying actions. Data needs to be entered in the CCDS and the violation information screen.			
MOAC A4	Number facilities committing to install controls as the result of commitments in NSR/PSD enforcement actions	Docket (Annual) Case Conclusion Screen: EDC, PER	A new violation type has been created on the case initiation screen of docket to track these complying actions. Data needs to be entered in the CCDS and the violation information screen.			
MOAC A5	Number of investigations conducted for suspected NSR/PSD violations	Manual (Semi-annual)	Report as part of the mid-year and EOY reporting cycle on the overall NPMS Investigations Manual Reporting Form.			

Measur e Code	Measure	Data Source	Reporting Directions
MOAC A6	Number of investigations conducted at coal-fired power plants	Manual (Semi-annual)	Report as part of the mid-year and EOY reporting cycle on the overall NPMS Investigations Manual Reporting Form.
MOAC A7	Number of inspections conducted at MACT sources: both major and minor	AFS (Se mi-annual)	Regions are to report both major and minor MACT inspections in AFS.
MOAC A7	Existing Measures (No new reporting or data modification): Number of NSR/PSD inspections; Number of enforcement actions initiated and concluded; SNC rate for coal-fired power plants, NSR/PSD facilities; SNC duration and SNC recidivism; Number of facilities reached through compliance assistance.		